

**United States Bankruptcy Court
Western District of Texas**

In re Ricardo D Cortez, Jr.
Christina M Cortez

Debtor(s)

Case No. 09-52593

Chapter 7

MOTION TO REOPEN CASE

TO THE HONORABLE RONALD B. KING, UNITED STATES CHIEF BANKRUPTCY JUDGE:

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

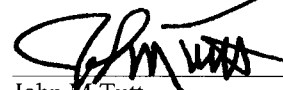
Ricardo D. Cortez, Jr. and Christina M. Cortez, Debtors, file this Motion to Reopen Case, and in support of it respectfully represent to the Court as follows:

1. This case was filed on May 26, 2009. Debtors performed most of their duties, and the case was closed on December 16, 2009.
2. Debtors failed to take the Financial Management Course due to error.
3. Debtors have now taken the Financial Management Course.
4. Section 350(b) of the Bankruptcy Code provides that "[a] case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause." The court in *Sterritt v. Continental Inv. Corp.*, 2002 WL 1315514 (N.D. Tex 2002) found that the phrase "for other cause" found in section 350(b) as ground to reopen a bankruptcy case should be given an expansive reading as a generous term designed to encompass a broad panoply of circumstances which could not be anticipated by the drafters of the statute. The Fifth Circuit has given the phrase "for other cause" an expansive reading. *Citizens Bank & Trust Company v. Case*, 937 F.2d 1014 (5th Cir 1991).
5. Debtors seek to reopen their case in order to file the Financial Management Course certificates and request the entry of their Discharge of Debtor.
6. Debtors seek to have their case reopened to accord relief to the Debtor, and for other cause.

WHEREFORE, Debtors request the Court to enter its order reopening this case, and for such other and further relief to which they may be entitled.

Respectfully submitted,

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(210) 568-2617 fax



John M. Tutt
SBN: 20347000

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on August 13, 2010, a true and correct copy of the foregoing document was served on the following parties via electronic means as listed on the court's ECF noticing system or by regular first class mail:

See attached Service List



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United States Trustee - SA12 12
US Trustee's Office
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San Antonio, TX 78295-1539

--- msg ---
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ARLINGTON TX 76096-3853

Arthritis Center of S Texas
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San Antonio, TX 78298-2207

Baptist M&S Imaging
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Dallas, TX 75284-9553

CCS
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CMRE Financial Services
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Brea, CA 92821-6753

CPS Security
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San Antonio, TX 78265-3698

Cancer Care Center of South Texas
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Capital Management Services
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Carlos Morales
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Castillo Medical Group
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Financial Control Services
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